

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,	§	
	§	
Plaintiffs,	§	
v.	§	Civil Action No. 4:20-cv-00957-SDJ
	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

MOTION FOR PROTECTIVE ORDER

Google LLC moves pursuant to Federal Rule of Civil Procedure 26(c)(1) for a protective order forbidding the State of Texas, et al. from seeking Interrogatories, Requests for Production, and noticed 30(b)(6) deposition topics described in Exhibits A-C of Google LLC's Memorandum of Law in Support of its Motion for Protective Order, as well as the noticed deposition of Google's in-house counsel described therein. The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order is attached.

Dated: April 9, 2024

Respectfully submitted,

/s/ R. Paul Yetter

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CERTIFICATE OF SERVICE

I certify that, on April 9, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ R. Paul Yetter
R. Paul Yetter

CERTIFICATE OF CONFERENCE

I certify that on the 9th day of April 2024, counsel has complied with the meet and confer requirement of Local Rule CV-7(h). Specifically, Google (Rob McCallum, Mollie Bracewell) conferred by telephone with Plaintiffs counsel (Geraldine Young, Zeke DeRose) on April 9, 2024. The parties are at an impasse on the issues detailed in the accompanying memorandum of law.

/s/ R. Paul Yetter
R. Paul Yetter